

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

**1:17-cv-127**

**DARRELL A. CONNOR, Individually and )  
As Executrix of the Estate of CHARLES )  
FRANKLIN CONNOR, Deceased, )  
                                                  )  
                                                    )  
**Plaintiff,**                                 )  
                                                    )  
                                                    )  
**vs.**                                            )  
                                                    )  
**NORFOLK SOUTHERN RAILWAY**                 )  
**COMPANY, ET AL.**                              )  
                                                    )  
**Defendants.**                                 )  
                                                    )**

---

**STIPULATION OF VOLUNTARY DISMISSAL AS TO  
DEFENDANT GOULDS PUMPS LLC**

Now come Plaintiff and Defendant, Goulds Pumps LLC, by and through the undersigned counsel, and stipulate to the voluntary dismissal with prejudice the above-captioned matter only as to Goulds Pumps LLC, pursuant to Rule 41 of the FRCP. The parties agree that each party will bear its own costs.

Respectfully submitted, this the 3<sup>rd</sup> day of December, 2018.

**WE CONSENT:**

/s/Benjamin D. Braly  
Benjamin D. Braly, Esq.  
Admitted *Pro Hac Vice*  
Dean Omar & Branham LLP  
302 N. Market Street, Suite 300  
Dallas, TX 75202  
Phone: 214-722-5990

**WE MOVE:**

/s/ Tracy E. Tomlin  
Tracy E. Tomlin, Esq.  
NC Bar No.: 26267  
Nelson Mullins Riley & Scarborough, LLP  
301 South College Street, 23<sup>rd</sup> Floor  
Charlotte, NC 28202  
Phone: 704-417-3101

Email: bbraly@dobllp.com

Fax: 704-417-3227

Email: tracy.tomlin@nelsonmullins.com  
Attorney for Goulds Pumps LLC

/s/ William M. Graham

William M. Graham, Esq.

NC Bar No.: 17972

Wallace & Graham, P.A.

525 North Main Street

Salisbury, NC 28144

Phone: 704-633-5244

Fax: 704-633-9434

Email: bgraham@wallacegraham.com

Attorneys for Plaintiff

## CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

- **TIMOTHY W. BOUCH**  
tim@bouchmcleod.com,yancey@bouchmcleod.com,sarah@bouchmcleod.com,amy@bouchmcleod.com
- **BENJAMIN D. BRALY**  
bbraly@dobllp.com,spepin@dobllp.com
- **CHARLES W. BRANHAM , III**  
tbranham@DOBLLP.com,spepin@dobllp.com
- **KEVIN LEE CHIGNELL**  
kevinchignell@parkerpoe.com,kathythompson@parkerpoe.com,rosedarden@parkerpoe.com
- **KEITH E. COLTRAIN**  
keith.coltrain@walltempleton.com,cathy.albanese@walltempleton.com
- **W. DAVID CONNER**  
dconner@hsblawfirm.com,sturner@hsblawfirm.com,tfreedle@hsblawfirm.com,jbonnoitt@hsblawfirm.com
- **JAMES M. DEDMAN , IV**  
jdedman@gwblawfirm.com,rmeyer@gwblawfirm.com,jspurling@gwblawfirm.com
- **WILLIAM P. EARLY**  
willearly@phswlaw.com,sherrymanning@phswlaw.com,barbiechinnis@piercesloan.com,rachaeltomlinson@phswlaw.com
- **SCOTT E. FRICK**  
sfrick@hsblawfirm.com,sturner@hsblawfirm.com,tfreedle@hsblawfirm.com,jbonnoitt@hsblawfirm.com
- **FRANK J. GORDON**  
fgordon@mgsattorneys.com,kelliott@mgsattorneys.com,bmagram@mgsattorneys.com
- **WILLIAM MARC GRAHAM**  
bgraham@wallacegraham.com,cpine@wallacegraham.com,khoffner@wallacegraham.com
- **CARTER T. LAMBETH**  
ctl@johnsonandlambeth.com,sarah@johnsonandlambeth.com
- **RHYAN J. LINDLEY**  
rlindley@vonbriesen.com,lstaffei@vonbriesen.com,tdahms@vonbriesen.com
- **CHRISTOPHER BARTON MAJOR**  
cmajor@hsblawfirm.com,rstorrie@hsblawfirm.com,ldunn@hsblawfirm.com,tfreedle@hsblawfirm.com,kdawson@hsblawfirm.com,jbonnoitt@hsblawfirm.com
- **MOFFATT G. MCDONALD**  
mmcdonald@hsblawfirm.com,sturner@hsblawfirm.com,tfreedle@hsblawfirm.com,jbonn oitt@hsblawfirm.com

- **YANCEY A. MCLEOD , III**  
ymcleod@leathbouchlaw.com
- **PHILIP C. REID**  
preid@vonbriesen.com,tdahms@vonbriesen.com
- **WILLIAM W. SILVERMAN**  
william.silverman@walltempleton.com,emily.kiser-yellick@walltempleton.com,cathy.albanese@walltempleton.com,robin.seelbach@walltempleton.com
- **WILLIAM MICHAEL STARR**  
bill.starr@nelsonmullins.com,kathy.southworth@nelsonmullins.com
- **SABRINA G. STONE**  
sstone@dobllp.com,mbuha@dobllp.com,spepin@dobllp.com,case@dobllp.com
- **JENNIFER M. TECHMAN**  
JMTechman@ewhlaw.com,asrogers@ewhlaw.com,plsisk@ewhlaw.com,rlhuenefeld@ewhlaw.com
- **TRACY E. TOMLIN**  
tracy.tomlin@nelsonmullins.com,jill.tucker@nelsonmullins.com,christine.greene@nelsonmullins.com
- (No manual recipients)

/s/Tracy E. Tomlin  
\_\_\_\_\_  
NC Bar No.: 26267  
Attorney for Goulds Pumps LLC  
Nelson Mullins Riley & Scarborough, LLP  
301 South College Street, 23<sup>rd</sup> Floor  
Charlotte, NC 28202  
(704) 417-3101 Direct Dial  
(704) 417-3227 Dedicated Facsimile  
tracy.tomlin@nelsonmullins.com